

EXHIBIT 56
[FILED UNDER SEAL]

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

THE STATE OF TEXAS, et al.,	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action No. 4:20-cv-00957-SDJ
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

DECLARATION OF [REDACTED]

I, [REDACTED], pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I have worked for Google LLC (“Google”) for approximately 12 years. I am currently the Engineering Director and a Lead of the Google Ad Manager team. I have personal experience with and knowledge of Google’s data sources which record Google Ad Manager activity, and I have familiarity with the production of the data identified with Bates numbers GOOG-AT-MDL-DATA-000000001 and GOOG-AT-MDL-DATA-000066502 (the “Header Bidding Monitor Data Set”). Based on my personal experience with and knowledge of Google’s data, I describe below my understanding of the general structure of the Header Bidding Monitor Data Set, though there may be exceptions (e.g., bugs).

2. Each record within the Header Bidding Monitor Data Set contains information about a specific group of requests processed by Google Ad Manager in a particular month. The Header Bidding Monitor Data Set contains several data fields, each of which contains different information about the requests in each record. One of those fields is “transaction_type”, and that field contains values corresponding to different ways in which requests may be processed.

3. One of the values that may be contained within the “transaction_type” field is “EBDA”. The abbreviation “EBDA” refers to “Exchange Bidding with Dynamic Allocation,” which is an earlier name for the feature that is today known as “Open Bidding” and that I refer to as “Open Bidding” in this declaration.

4. AdX refers to Google’s ad exchange, where bids from Google Ads, DV360, non-Google demand side platforms, and non-Google networks compete in an auction. Open Bidding refers to a separate auction where bids from non-Google ad exchanges compete. If an impression is transacted through Open Bidding, then it is not considered to be an AdX transaction.

5. In the Header Bidding Monitor Data Set, records for which the “transaction_type” field takes on a value of “EBDA” describe transactions that occurred through Open Bidding, meaning that transactions labeled “EBDA” did not occur in AdX.

6. I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge.

Executed on the 13 day of November, 2024, in [REDACTED].

[REDACTED]